

Miguel A. Terc, Jr.  
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Attorney(s) for C.A.J.113 LUDLOW CORP

## United States Bankruptcy Court

Eastern District Of New York

In re	<u>BULGARIAN BAR INC.</u>	Case No.
	<i>dba BG Bar Inc. – Pending</i>	<u>22-40264-JMM</u>
	Debtor	
		Chapter
		<u>11</u>

### Amended Notice of Motion

**PLEASE TAKE NOTICE**, that upon the annexed Request for Relief of TERC LAW OFFICE, P.C attorney for C.A.J.113 LUDLOW CORP, the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. Section 362(d)(1) and (d)(2), modifying the automatic stay herein to permit movant to retain possession of commercial real estate property known as 113 Ludlow St, ground floor and basement, New York, NY 10002 and dispensing with the Rule 4001(1)(a) stay of enforcement, together with such other and further relief as to the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that this motion shall be returnable on the 4<sup>th</sup> day of May 2022, at 11:00 Am o'clock in the forenoon of that day, or as soon thereafter as counsel can be heard, at the U.S. Bankruptcy Court, 271 Cadman Plaza East, Brooklyn, New York 11201. Appearance to be held telephonically as follows: Dial in Number 888-273-3658 Access Code – 2872314

**PLEASE TAKE FURTHER NOTICE**, that answering papers, if any, must comply with the Federal Rules of Bankruptcy Procedure, shall be filed with the Court and served upon and received by TERC LAW OFFICE, P.C, Attorneys for the Movant, at their

offices located at 31-87 Steinway St, Ste 2, Astoria, NY 11103 so that they are received no later than two (2) business days before the hearing on the Motion.

Dated: 3/31/22

*/s/ Miguel A. Terc, Jr*

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By: Miguel A. Terc, Esq  
**TERC LAW OFFICE, P.C**  
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Astoria, NY 11103  
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**TO:**

***U.S. Trustee***  
**Office of the United States Trustee**  
Eastern District of NY (Brooklyn Office)  
U.S. Federal Office Building  
201 Varick Street, Suite 1006  
New York, NY 10014

**Alla Kachan**  
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2799 Coney Island Avenue  
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**Bulgarian Bar Inc.**  
113 Ludlow St.  
New York, NY 10002